

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 19-cv-00238-FL**

PRIME COMMUNICATIONS, L.P.,

Plaintiff,

v.

RAGSDALE LIGGETT, P.L.L.C,

Defendants.

MOTION FOR ATTORNEY'S FEES

Pursuant to Rule 37(a)(5)(A) of the Federal Rules of Civil Procedure, Local Civil Rules 7.2, and this Court's Order entered March 19, 2020, Defendant, RAGSDALE LIGGETT, P.L.L.C, (hereinafter "Ragsdale Liggett") by and through counsel, respectfully moves the Court for an award of attorney's fees and costs reasonably incurred by Defendant in making its Motion to Compel. Defendant submits the accompanying memorandum of law and the corresponding attached exhibits, in support of this motion

Respectfully submitted,

This the 26th day of March, 2020.

HEDRICK GARDNER KINCHELOE & GAROFALO LLP

**BY: /s/ PATRICIA P. SHIELDS
PATRICIA P. SHIELDS
N.C. State Bar No. 13005
TATIANA M. TERRY
N.C. State Bar No. 55194
Attorneys for Defendant
4131 Parklake Ave, Suite 300
Raleigh, NC 27612
919-719-3729
Email: pshields@hedrickgardner.com**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Attorney's Fees was served upon all counsel of Record by filing the foregoing document with the Clerk of the United States District Court, Eastern District of North Carolina, using the CM/ECF system which will send notification of the filing to the following:

Ashish Mahendru
Darren Braun
Mahendru, P.C.
639 Heights Blvd.
Houston, TX 77007
amahendru@thelitigationgroup.com
dbraun@thelitigationgroup.com

John M. Kirby
Law Offices of John M. Kirby
4801 Glenwood Avenue, Suite 200
Raleigh, NC 27612
john@legal-nc.com

This the 26th day of March, 2020.

/s/ PATRICIA P. SHIELDS
NC State Bar No. 13005
Attorney for Defendant
4131 Parklake Avenue, Suite 300
Raleigh, NC 27612
(919) 719-3729
Email: pshields@hedrickgardner.com